

STAHL & ZELMANOVITZ

June 11, 2021

**By ECF**

The Honorable Lewis J. Liman  
United States District Judge  
United States District Court  
500 Pearl Street, Room 701  
New York, New York 10007

**Re: Mayra Joana Macas et al. v. K.Y. Young, Inc. et al.  
Case No. 21-cv 03244 (LJL)**

Dear Judge Liman:

We have just been retained to represent the defendants in this action. We respectfully request that the Court grant defendants until July 15, 2021 by which to answer or move with respect to the complaint.

The earliest time for any of the defendants to answer the complaint is June 17, 2021. This is the first request by defendants for an extension of time. Counsel for plaintiffs consents to this request as indicated by the attached stipulation.

Defendants' counsel requests this extension so as to adequately research the claims and facts alleged in the complaint, to discuss the matter with defendants, and to formulate an appropriate response.

Based on our review of the docket in this action, it appears that the Court has scheduled the Initial Pretrial Conference for July 1, 2021. We respectfully request that the Court adjourn the conference date to a date after July 23, 2021 so as to allow sufficient time for the parties to submit the Court's Case Management Plan and Scheduling Order a week before the conference.

Respectfully submitted,



Joseph Zelmanovitz

Enclosure

cc: Clela Alice Errington, Esq. (by ECF)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MAYRA JOANA MACAS and MARIA  
JEREZ, individually and on behalf of others  
similarly situated,

Case No. 21-cv-03244 (LJL)

**STIPULATION AND ORDER**

Plaintiffs,

- against -

K.Y. YOUNG, INC. (D/B/A DOLCE SPA  
NYC), CYNTHIA LEE, KYUNG SOON YI,  
and JOHN DOE LEE (A.K.A. MR. LEE),

Defendants.  
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IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto,  
through their undersigned counsel, that the time for defendants K.Y. Young, Inc. (d/b/a Dolce  
Spa NYC), Cynthia Lee, and Kyung Soon Yi (also sued herein as "John Doe Lee (a.k.a. Mr.  
Lee)"), to answer, move or otherwise respond to the complaint is extended to and including July  
15, 2021. Defendants agree that they will waive any defenses as to service of process.

Dated: June 11, 2021

MICHAEL FAILLACE & ASSOCIATES, P.C.  
*Attorneys for Plaintiffs*

/s/ Clela Errington  
Clela Alice Errington  
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STAHL & ZELMANOVITZ  
*Attorneys for Defendants*

[Signature]  
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747 Third Avenue, Suite 33B  
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(212) 826-6422

SO ORDERED:

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U.S.D.J.